

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Khalilah Suluki,)	
)	
Plaintiff,)	
)	
v.)	
)	CASE NO. 1:21-cv-01156-SHS
Credit One Bank, NA; <i>et al.</i> ,)	
)	
Defendants.)	
)	

PLAINTIFF’S NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that Plaintiff Khalilah Suluki moves the Court before the Honorable Sidney H. Stein, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, on a date and time to be determined by the Court, for an order granting, pursuant to Federal Rule of Civil Procedure 56 and District Local Rule 56.1, summary judgment against Defendant Credit One Bank on her claims under the Fair Credit Reporting Act.

Plaintiff bases this Motion on her contemporaneously filed: (1) Memorandum of Law; (2) Statement of Undisputed Facts and exhibits annexed thereto; and (3) Declaration of Craig C. Marchiando.

PLEASE TAKE FURTHER NOTICE that, pursuant the Court’s Order entered on March 22, 2022, any opposing materials shall be filed and served on or before May 5, 2022, and any reply materials shall be filed and served on or before May 19, 2022.

April 14, 2022.

Respectfully submitted,

Khalilah Suluki

/s/ Craig C. Marchiando

Craig C. Marchiando

Leonard A. Bennett (*pro hac vice*)

CONSUMER LITIGATION ASSOCIATES, P.C.

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